REMARKS

In response to the Office Action dated February 9, 2006, Applicants respectfully request reconsideration and withdrawal of the rejections of the claims. To facilitate the examination of the application, the subject matter of claims 75 and 82 have been incorporated into their respective parent claims 74 and 81. In addition, the subject matter of claims 76 and 83 has been written in independent form.

Claims 74, 75, 79, 80, 82 and 87 were rejected under the first paragraph of 35 U.S.C. § 112. The Office Action states that the claims fail to comply with the enablement requirement. However, in the explanation of the rejection, the Office Action states "the term request renders the claims indefinite." This reference to indefiniteness appears to be directed to a rejection under the *second* paragraph of 35 U.S.C. § 112, rather than the first paragraph of the section. Thus, the specific basis for the rejection is not clear from the Office Action. In any event, it is respectfully submitted that the rejection is rendered moot by the foregoing amendments to the claims, regardless of whether the rejection is based upon the first or second paragraph of 35 U.S.C. § 112. Claims 74 and 81 recite an HTTP request for access to the electronic commerce site, and a referrer field of said request. Thus, only one request, and a referrer field associated with that request, is recited in the claims.

Claims 75, 80, 82 and 87 were rejected under 35 U.S.C. § 103, on the grounds that they were considered to be unpatentable over the Henson patent in view of the Blinn patent and the Fields et al. patent. As noted above, the subject matter of claim 75 has been incorporated into claim 74, and the subject matter of

claim 82 has been incorporated into claim 81. Therefore, claims 74 and 81 will be addressed in the context of the rejection of claims 75 and 82.

In setting forth the rejection, the Office Action states that the Henson patent discloses that a custom store application makes a determination that a request for access originated from a predetermined host "by examining embedded identifiers in an HTTP header", with reference to column 14, lines 19-61. It is respectfully submitted that the cited passage from the Henson patent does not support this statement. Specifically, there is no disclosure in the Henson patent of examining HTTP headers. Rather, the patent only discloses the use of the *link* that a customer executed to get to an online store, as an indicator of a group to which that customer belongs.

More generally, the Henson patent discloses that, upon recognition of the group to which a particular customer belongs, the online store only presents those choices that are appropriate for that group of customers. (Column 13, lines 30-37). With respect to the ability to recognize who a customer is, the patent states "a customer is identified as being in a particular customer set *according to what link the customer executed to get to the online store*." (Column 14, lines 19-21, emphasis added). The patent goes on to describe an example in which a particular type of customer, i.e. a federal government customer, is clicking through the pages of an online vendor. A link is embedded in at least one of those pages that enables the customer to proceed to the federal site. If the customer accesses that link, the online store then acts to treat the customer as a federal customer. That patent states "The general model is that if you can get to a page that has a link to the store in it, then a

customer is recognized as being in a particular customer group based upon the link used to access the online store." (Column 14, lines 38-41).

Nowhere in this passage does the Henson patent disclose that HTTP *headers* are examined. Rather, it discloses that, by clicking on a link that directs the user to a particular site, or page, the user is identified as belonging to the group associated with that site, or page. There is no disclosure that a header is examined to determine the host from which the link was clicked. In the context of the Henson patent, there is no need for such examination. The operation of the system described in the Henson patent is based upon the fact that the user clicked on a link to get *to* a particular page. Because of this, there is no need to know any information about the host from which the user accessed that link. As noted above, if the user has the ability to get to the page, the user is automatically identified as being a member of the group associated with that page, regardless of where the user came *from*.

The Office Action acknowledges that the Henson patent does not disclose the use of a referrer header field in an HTTP request. To this end, therefore, it relies upon the Fields patent, with particular reference to column 4, lines 44-67, and column 6, lines 1-26. The rejection concludes that it would be obvious to modify the Henson system to have a custom store application and make a determination by examining a referrer header field in an HTTP request. It is respectfully submitted that the references do not contain any disclosure to support this conclusion.

At column 4, lines 44-67, the Fields patent discloses that a referrer header is known, per se, which specifies the URL of a document from which a link was

followed. It dos not, however, contain any disclosure that suggests the use of a referrer header in a context of the Henson system.

The passage at column 6, lines 1-26 does not discuss referrer headers. Thus, it is not apparent why this passage was cited in the rejection.

It is respectfully submitted that there is no motivation to modify the Henson patent with the teachings of the Fields patent, as set forth in the Office Action. The Fields patent discloses that referrer headers can be used to enable a server to determine if a received request originated locally, or from somewhere else, and take the appropriate action. There is no apparent reason why this teaching would be applied to the system of the Henson patent. As noted previously, the Henson patent discloses that the classification of a customer as belonging to a particular group is based upon the *link* that the customer used to access a particular page. Whether that link originated locally, or from a remote location, is irrelevant to this determination. The only factor in the system of the Henson patent is that the customer *arrived* at a particular page. Where that customer arrived *from* is of no consequence. Hence, there is no need to utilize, or to examine, a referrer header in the context of the Henson system.

As purported motivation for combining the references, the Office Action states that " it is important to provide for Internet information distribution techniques that is lightweight, uses existing protocols and that is completely transparent to the end user." The Office Action does not identify the basis for this statement. In particular, it does not appear to be derived from the teachings of either of the Henson or Fields patents. Furthermore, it is not apparent how this general statement suggests the combination of these two particular references. Specifically, there is no apparent

nexus between this statement and the Fields patent's disclosure of referrer headers, nor the Henson patent's disclosure relating to the classification of customers. Accordingly, it is respectfully submitted that the Henson and Fields patents do not provide any motivation to combine their teachings in the manner set forth in the Office Action. Absent knowledge of the claimed invention, there is no apparent reason to consider the two references together.

Reconsideration and withdrawal of the rejection of claims 74 and 81, as well as their dependent claims, are respectfully requested.

Claims 76 recites a system for presenting customized information having a database that stores information relating to products, an administrative application that enables an administrator to define a custom store, and a custom store application that presents the custom store in response to certain requests. The claim further recites a reconciliation application that determines whether the configuration data defined by the administrative application includes information relating to products that are no longer available from the vendor. In such a case, the reconciliation application provides a notification to the administrator. Claim 83 recites analogous subject matter.

The rejection of claim 76 explicitly acknowledges that the Henson patent does not disclose a reconciliation application that determines whether configuration data includes information relating to products that are no longer available from the vendor, i.e. have become obsolete, and that provides notification to the administrator. Despite this acknowledgement, the Office Action rejects the claim, with reference to column 7, line 57, to column 8, line 6 of the Henson patent. It is respectfully submitted that this cited passage does not disclose, nor otherwise have any

relationship to, the subject matter of claims 76 and 81. Rather, this portion of the patent relates to the compatibility of various options in a configuration being built by a *customer*. It has nothing to do with configuration data that is stored in a database to define products that are to be made available to the customers in a custom store. Nor does it have anything to do with whether a particular product that is included in the configuration data is no longer available from the vendor. The validation, or compatibility, disclosed in the cited portion of the patent does not perform the same functions, nor provide the same results, as the reconciliation application of claim 76, nor the corresponding method step of claim 83.

For at least these reasons, therefore, it is respectfully submitted that all pending claims are patentably distinct from the cited prior art. Reconsideration and withdrawal of the rejections are therefore respectfully requested.

Respectfully submitted,

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Date: August 9, 2006

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